

**REMARKS**

**Summary of the Office Action**

Claims 4-7 are allowed.

Claims 9 and 11 are objected to as being dependent upon a rejected base claim but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Claims 1-3, 8 and 10 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application No. 2003/0058308 to Yamamoto.

**All Claims Define Allowable Subject Matter**

Claims 1-11 are amended to correct a typographical error, and to conform to U.S. practice. However, the amendments do not narrow the scope of the claims in any manner.

Claims 4-7 are allowed. Claims 9 and 11 are objected to as being dependent upon a rejected base claim but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants respectfully thank the Examiner for allowing claims 4-7, and for the indication of allowable subject matter recited in claims 9 and 11.

Claims 1-3, 8 and 10 are rejected under 35 U.S.C. § 102(e) as being anticipated by Yamamoto. Applicants respectfully traverse the rejection under 35 U.S.C. § 102(e). Claim 1 recites an ink-jet recording head including a substrate, a first conductive layer provided on the

substrate, an insulating layer provided on the first conductive layer, a second conductive layer formed on the insulating layer and coming into contact with the first conductive layer, and a heat generation layer disposed on the second conductive layer. Thus, as described at page 10, ll. 3-19, and illustrated in Figs. 1A-1H of Applicants' specification, the invention provides for example, that a first metal conductive layer 14 is patterned on a substrate 10. Subsequently, an interlayer insulating film 16 is formed. Application of a photo-resist 18, exposure and development, dry etching, and removal of the photo-resist 18 forms a contact portion in which the first metal conductive layer 14 is exposed in the interlayer insulating film 16. Then, a second metal layer 22 is formed on the interlayer insulating film 16 and in contact with the first metal conductive layer 14.

In contrast, Yamamoto is directed to an ink jet head having one conductive layer. As described at paragraphs 0053-0054, and illustrated in Fig. 2 of Yamamoto, a head structure 100 includes an electrode layer 110 as an upper layer adjacent to a resistor layer 108. Parts of the electrode layer 110 are removed so that the lower resistor layer 108 is exposed, thus forming portions 110a, 110b of electrode layer 110. Applicants respectfully submit that portions 110a, 110b are clearly the same layer. Accordingly, Applicants respectfully submit that Yamamoto does not teach or suggest at least the features of a first conductive layer and a second conductive layer, as recited in claim 1.

Moreover, portion 110a is formed on one side of the lower resistor layer 108 while portion 110b is formed on another side of the lower resistor layer 108, spaced from portion 110a. Accordingly, Applicants respectfully submit that Yamamoto does not teach or suggest the

features of a first conductive layer provided on a substrate, an insulating layer provided on the first conductive layer, and a second conductive layer formed on the insulating layer, as recited in claim 1. Furthermore, Yamamoto does not teach or suggest the features of a second conductive layer coming into contact with the first conductive layer, as recited in claim 1.

Claim 8 recites an ink-jet recording cartridge equipped with an ink-jet recording head. The ink-jet recording head includes a substrate, a first conductive layer provided on the substrate, an insulating layer provided on the first conductive layer, and a second conductive layer formed on the insulating layer and coming into contact with the first conductive layer. Claim 10 recites an ink-jet recording device equipped with an ink-jet recording cartridge equipped with an ink-jet recording head. The ink-jet recording head includes a substrate, a first conductive layer provided on the substrate, an insulating layer provided on the first conductive layer, and a second conductive layer formed on the insulating layer and coming into contact with the first conductive layer. As described above, Yamamoto is directed to an ink jet head having one conductive layer. Applicants respectfully submit that Yamamoto does not teach or suggest at least the features of a first conductive layer provided on a substrate, an insulating layer provided on the first conductive layer, and a second conductive layer formed on the insulating layer and coming into contact with the first conductive layer, as recited in claims 8 and 10.

Claims 2-3 depend from claim 1, claim 9 depends from claim 8, and claim 11 depends from claim 10. The dependent claims recite the same combination of allowable features recited in the respective independent claims, as well as additional features that define over the prior art.

Accordingly, it is requested that the rejection under 35 U.S.C. § 102(e), of claims 1-3, 8 and 10, be withdrawn, and the claims allowed.

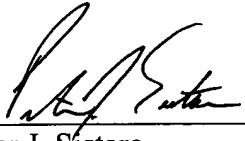
**CONCLUSION**

In view of the foregoing, Applicants respectfully request reconsideration and the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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